



Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs

Department of Environmental Protection

Western Regional Office • 436 Dwight Street, Springfield MA 01103 • 413-784-1100

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June 20, 2016

Mr. Harry Wahra
Irwin Industrial Tool Company d.b.a.
Lenox Tools
301 Chestnut Street
East Longmeadow, MA 01028

RE: East Longmeadow
Transmittal No.: X265480
Application No.: WE-15-004
Class: SM80-R
FMF No.: 130678
AIR QUALITY PLAN APPROVAL

Dear Mr. Wahra:

The Massachusetts Department of Environmental Protection ("MassDEP"), Bureau of Waste Prevention, has reviewed your Non-Major Comprehensive Plan Application ("Application") listed above. This Application concerns the proposed construction and operation of several existing rust preventive application operations at your Irwin Industrial Tools Company d.b.a. Lenox Tools ("Lenox Tools") facility located at 301 Chestnut Street in East Longmeadow, Massachusetts ("Facility"). In response to MassDEP's administrative deficiency letter dated April 30, 2015, Lenox Tools submitted a completely revised Application received February 29, 2016. The revised Application bears the seal and signature of Melanie A. Holtz, Massachusetts Registered Professional Engineer number 36442.

This Application was submitted in accordance with 310 CMR 7.02 Plan Approval and Emission Limitations as contained in 310 CMR 7.00 "Air Pollution Control," regulations adopted by MassDEP pursuant to the authority granted by Massachusetts General Laws, Chapter 111, Section 142 A-J, Chapter 21C, Section 4 and 6, and Chapter 21E, Section 6. MassDEP's review of your Application has been limited to air pollution control regulation compliance and does not relieve you of the obligation to comply with any other regulatory requirements.

MassDEP has determined that the Application is administratively and technically complete and that the Application is in conformance with the Air Pollution Control regulations and current air pollution control engineering practice, and hereby grants this **Plan Approval** for said Application, as submitted, subject to the conditions listed below.

Please review the entire Plan Approval, as it stipulates the conditions with which the Facility owner/operator ("Permittee") must comply in order for the Facility to be operated in compliance with this Plan Approval.

1. DESCRIPTION OF FACILITY AND APPLICATION

Lenox Tools designs, tests and manufactures power tool accessories, hand tools and band saw blades at their existing 301 Chestnut Street facility. The facility currently has four air quality limited plan approvals (LPAs) (#1-P-01-040, #1-P-01-041, #1-P-01-044 and #1-P-01-047). The LPAs were all issued in 2001 for four different coating operations. A Restricted Emission Status #1-R-01-023 was also issued in 2001 which established a facility-wide emission limit on glycol ethers which is a category of hazardous air pollutants.

Lenox Tools has submitted a non-major comprehensive plan approval (NMCPA) application for the construction and operation of several existing rust preventive (RP) application operations, as well as several new RP application operations, located at 301 Chestnut Street, East Longmeadow. The actual emissions from each of the existing RP application operations are less than one ton per year of VOCs and HAPs. However, many of the existing RP application operations were constructed within the same 12 consecutive month period and have an aggregated potential to emit greater than 1 ton of VOCs. Therefore, the RP application emission increases are not de minimis increases pursuant to 310 CMR 7.02(2)(b)7. and are subject to the plan approval requirements of 310 CMR 7.02.

The NMCPA application requests approval for the application of an existing RP material identified as Houghton International Inc., Rust Preventive 2142-95-01 in the existing and new RP application operations. Houghton International Inc., Rust Preventive 2142-95-01 contains a maximum of 5.7 pounds of VOCs per gallon, as applied and 0.07 pounds of HAPs per gallon, as applied (based on a specific gravity of 0.85 and a HAP content of less than 1% by weight) according to the supplemental information provided by the material manufacturer. The RP is used in three areas at the facility which are the Carbide Department, the Bi-Metal Coil Department and the Band Saw Department for the purpose of preventing the formation of iron oxide on the metal blades during shipment to customers, storage and during in-house blade processing. A description of the RP application in each of the departments is contained in the following paragraphs.

In the Carbide Department and the Bi-Metal Coil Department, the RP is applied to linear metal stock as it passes through an enclosed 6" x 6" x 12" application chamber. The application chamber is located prior to the stock being rewound into coils. As the stock passes through the enclosed application chamber, the RP is pumped from an approximate 2 gallon capacity enclosed reservoir and applied via a recirculated flood application. The RP is poured over felt pads which transfer the RP to the stock. The felt pads also remove excess RP. Excess RP collects in the bottom of the application chamber and drains through a tube into the enclosed reservoir for reuse in the application chamber. The fugitive VOC and HAP emissions are minimized by having an enclosed reservoir and enclosing the application chamber except for where the stock enters and exits the chamber. Felt pads also minimize excess RP dragout from the application chamber.

The Carbide Department currently has a RP application chamber in each of the 37 grind cells, plastic edge line and peen line. The facility plans to construct an additional 6 grind cells and a

plastic edge line (honing line) which will each have a RP application chamber. Each grind cell processes the metal coil through three different in-line grinding machines. After the third grinding step, the RP is applied to the metal coil. The plastic edge line is the process where the plastic edging is placed over the tooth edge of certain blades to protect the teeth from handling damage. The RP is applied prior to installing the plastic edge. The peen line is the stress inducing process for the metal which is fed through and blasted by media. RP is applied at the end of the peening process.

The facility has proposed that the maximum air contaminant emission from the application of RP in the Carbide Department will not exceed 1.72 tons per year of VOCs and 0.022 tons per year of HAPs based on a maximum VOC content of 5.7 pounds per gallon as applied, a maximum HAP content of 0.07 pounds per gallon as applied and a maximum usage of 603.5 gallons per year.

The Bi-Metal Coil Department currently has a RP application chamber in each of the 4 peen lines and 8 straighteners. The facility plans to construct an additional peen line and 2 straighteners which will each have a RP application chamber. The straighteners are machines that remove any bends or bows in the stock so it lies flat and straight. The RP is applied after straightening.

The facility has proposed that the maximum air contaminant emission from the application of RP in the Bi-Metal Coil Department will not exceed 11.27 tons per year of VOCs and 0.14 tons per year of HAPs based on a maximum VOC content of 5.7 pounds per gallon as applied, a maximum HAP content of 0.07 pounds per gallon as applied and a maximum usage of 3954.39 gallons per year.

In the Band Saw Department, RP is applied to the weld areas of coils, band saw blades and port-a-band blades. For coils and band saw blades, the RP is applied by hand using a felt pad on a fully enclosed plunger can. RP is only applied to the felt pad when the plunger is depressed. The welded area of the coil or blade is held by hand against the felt pad while the plunger is depressed to apply the RP onto the desired area. The facility currently has 13 RP hand applicators and plans to add two more. In addition, the welded area of the port-a-band blades is manually dipped into a dip pan containing RP. The dip pan has a capacity of approximately 5 gallons but contains approximately 3 gallons of RP to allow for displacement. After the port-a-bands are removed from the dip pan, they are placed on a drainage rack. The excess RP drains from the drainage rack onto a tray which drains back into the dip pan. When the dip pan is not in use and the port-a-bands are still draining, the dip pan is partially closed except for a small opening that allows the RP to drain into the dip pan. The dip pan is completely covered by a plexi-glass cover when the dip pan is not in use and the port-a-bands are not draining.

The facility has proposed that the maximum air contaminant emission from the application of the RP in the Band Saw Department will not exceed 1.1 tons per year of VOCs and 0.014 tons per year of HAPs based on a maximum VOC content of 5.7 pounds per gallon as applied, a maximum HAP content of 0.07 pounds per gallon as applied and a maximum usage of 385.96 gallons per year.

In addition, the facility has several air contaminant sources that exist at their facility which have been demonstrated to be exempt from the plan approval requirements of 310 CMR 7.02 and are discussed in the following paragraphs. They have been included here for descriptive purposes.

The following existing air contaminant sources are exempt from the plan approval requirements of 310 CMR 7.02 pursuant to 310 CMR 7.02(2)(b)7 since the facility maintains records to demonstrate that the actual emissions of VOCs and HAPs from each source are less than 1 ton per year.

- 12-Ink Jet Printers – The printers use inks, which contain methyl ethyl ketone (MEK) and alcohol, to apply product name, size and product code at set intervals on the band coil stock. Each printer has actual VOC emissions less than 1 ton per year. The total actual VOC emissions from all 12-printers is less than 1 ton per year.
- 9-Pad Printing Units –The printers use inks to apply a logo to the painted linear edge blades. Each printer has actual VOC emissions less than 1 ton per year. The total actual VOC emissions from all 9-printers is less than 1 ton per year.
- Miscellaneous Parts/Sample Cleaning – Methanol, which is a VOC and a HAP, is applied by hand to the part or sample by using a squeeze bottle. The use of methanol for cleaning is conducted in the metallurgical lab and tool room. The actual VOC and HAP emissions from the use of methanol are less than 1 ton per year.
- Tool Room Spray Booth – Coatings which contain VOCs are applied in the tool room spray booth. The actual VOC emissions from the application of coatings are less than 1 ton per year.

The following existing air contaminant sources are exempt from the plan approval requirements of 310 CMR 7.02 since they were constructed at the facility prior to September 15, 1970, no physical changes have been made to the source or its method of operation and the facility maintains records to demonstrate that the source has not had an increase of any air contaminant of 1 ton or more calculated in any 12 consecutive period since September 15, 1970 pursuant to 310 CMR 7.02(1)(b).

- Four Degreasing Lines –The four degreasing lines, which use mineral spirits (VOC), were constructed at the facility in the 1960s. Since their construction, there have been no changes to the source nor any increase of any air contaminant of 1 ton or more calculated in any 12 consecutive month period. The actual VOC emissions from all four degreasing lines are approximately 7 tons per year.
- Manual Dip Line –The Dip line, which uses paints that contain VOCs, was constructed at the facility in the 1960s. Since its construction, there have been no changes to the source nor any increase of any air contaminant of 1 ton or more calculated in any 12 consecutive

month period. However, the manual dip line has been physically removed from the facility.

The facility uses non-refillable aerosol cans of paints, lubricants, etc. The use of non-refillable aerosol cans are exempt from the plan approval requirements of 310 CMR 7.02 pursuant to 310 CMR 7.02(2)(b)16 since they are insignificant activities.

The facility applies a floor sealer as part of routine maintenance or repair of the facility. The application of the floor sealer is subject to 310 CMR 7.25: U Best Available Controls for Consumer and Commercial Products, but is exempt from the plan approval requirements of 310 CMR 7.02 pursuant to 310 CMR 7.02(2)(b)17. Maintenance or Repair.

Regulatory Applicability

The application of RP is subject to the best available control technology (BACT) requirements of 310 CMR 7.02(8)(a)2. In lieu of an emission-unit-specific top-down BACT analysis, an applicant may propose an emission control limitation by using one or more of the approaches contained in 310 CMR 7.02(8)(a)2.a. through c. Lenox Tools has chosen to comply with 310 CMR 7.02(8)(a)2.b. which allows for the proposal of an emission control limitation using a combination of best management practices, pollution prevention and a limitation on the hours of operation and /or raw material usage. This approach is only available if the proposed allowable emissions are less than 18 tons of VOCs per 12 consecutive month period, less than 18 tons of total organic material HAP and less than ten tons of a single organic material HAP.

As part of the pollution prevention portion of the BACT analysis, Lenox Tools evaluated 22 alternatives to the existing RP material which is Houghton International Inc., Rust Preventive 2142-95-01. This evaluation had an emphasis on rust preventives which have a VOC content of 0.42 pounds per gallon (50 grams per liter) or less, as applied. This VOC content is currently the metal protecting fluid limitation as required by California's South Coast Air Quality Management District (SCAQMD) RULE 1144 – Metalworking Fluids and Direct Contact Lubricants.

Of the 22 alternative RP materials, 13 were tested for technical feasibility. To determine technical feasibility of each rust preventive, the facility developed a comprehensive test process which consisted of 5 steps with an acceptance criteria for each of the 5 steps. The five step test process consisted of:

1. Drying Test (in-house test)
2. ASTM B-117 Salt Spray Test(Sample set offsite for testing)
3. Band Welding Handling and Production Test
4. Long-term Distribution Test
5. Full Production Test

Only one of the alternative RPs passed the first 3 steps which was the Houghton International Inc., Rust Veto 4242 (VOC content ~3.4 lb/gal). However, it was found to be unacceptable in

step #4 since the Poland distribution center found that their printed product information smeared on the blades due to the residual RP. In addition, the blade was found to be too wet to have the plastic strip applied to protect the saw teeth from damage.

Based on the technical feasibility results of 13 alternative lower VOC-containing RP materials, none were found to be an acceptable replacement for the existing Houghton International Inc., Rust Preventive 2142-95-01.

Therefore, the facility has proposed to comply with the BACT requirements contained in 310 CMR 7.02(8)(a)2.b. by proposing VOC and HAP emission limitations, limiting the VOC and HAP content of the RP, limiting the amount of RP material that is used in any 12 consecutive month period, using good housekeeping practices to minimize emissions and implementing work practices. In the Carbide Department and the Bi-Metal Coil Department, work practices include the use of RP application chambers with an enclosed reservoir. The application chambers are enclosed except for where the stock enters and exits the application chamber. In the Band Saw Department, work practices include the use of fully enclosed plunger cans, a dip pan that is completely covered when not in use and a drainage rack for port-a-band blades which allows the excess RP to drain back to the dip pan.

In addition to being subject to the BACT requirements of 310 CMR 7.02(8)(a)2., the facility is subject to the visible emission requirements of 310 CMR 7.06, the dust, odor, construction and demolition requirements of 310 CMR 7.09 and the noise reduction requirements of 310 CMR 7.10.

MassDEP has determined that the application of a RP as a protective oil for metal is not a surface coating for the purposes of applying the requirements of 310 CMR 7.18(11) for Surface Coating of Miscellaneous Metal Parts and Products. MassDEP based its decision on EPA's definition of coating contained in the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products - 40 CFR Part 63 Subpart Mmmm since MassDEP's coating definition does not specifically address the use of protective oils for metals. The definition of coating contained in 40 CFR Part 63 Subpart Mmmm states, in part, that "Decorative, protective, or functional materials that consist only of protective oils for metal, acids, bases, or any combination of these substances, or paper film or plastic film which may be pre-coated with an adhesive by the film manufacturer, are not considered coatings for the purposes of this subpart."

2. EMISSION UNIT (EU) IDENTIFICATION

Each Emission Unit (EU) identified in Table 1 is subject to and regulated by this Plan Approval:

Table 1			
EU#	Description	Design Capacity	Pollution Control Device (PCD)
52	Carbide Department RP Application Operations include: <ul style="list-style-type: none"> • 43- Grind Cell RP Application Chambers, each w/ an approximate 2 gallon capacity reservoir • 1 -Plastic Edge Line RP Application Chamber w/ an approximate 2 gallon capacity reservoir • 1-Plastic Edge/Honing Line RP Application Chambers w/an approximate 2 gallon capacity reservoir • 1- Peen Line RP Application Chamber w/ an approximate 2 gallon capacity reservoir 	N/A	None
53	Bi-Metal Coil Department RP Application Operations include: <ul style="list-style-type: none"> • 5- Peen Line RP Application Chambers, each w/ an approximate 2 gallon capacity reservoir • 10- Straighteners RP Application Chambers, each w/ an approximate 2 gallon capacity reservoir 	N/A	None
54	Band Welding Department RP Application Operations include: <ul style="list-style-type: none"> • RP Hand Applicators • 1-RP Dip Pan (approximate 5 gallon capacity) 	N/A	None

Table 1 Key:

EU# = Emission Unit Number

N/A = Not Applicable

RP = Rust Preventive

3. APPLICABLE REQUIREMENTS

A. OPERATIONAL, PRODUCTION and EMISSION LIMITS

The Permittee is subject to, and shall not exceed the Operational, Production, and Emission Limits as contained in Table 2a/2b below:

Table 2a			
EU#	Operational / Production Limit	Air Contaminant	Emission Limit
52	1. Pursuant to the best available control technology provision of 310 CMR 7.02(8)(a)2, the rust preventive shall not exceed 5.7 pounds of VOCs per gallon, as applied.	VOC	≤1.72 tons in any 12 consecutive month period
	2. Pursuant to the best available control technology provision of 310 CMR 7.02(8)(a)2, the rust preventive shall not exceed 0.07 pounds of HAPs per gallon, as applied.	Total HAP	≤0.022 tons in any 12 consecutive month period
	3. Pursuant to the best available control technology provision of 310 CMR 7.02(8)(a)2, no more than 603.5 gallons of rust preventive shall be used ¹ in any 12 consecutive month period.		
53	4. Pursuant to the best available control technology provision of 310 CMR 7.02(8)(a)2, the rust preventive shall not exceed 5.7 pounds of VOCs per gallon, as applied.	VOC	≤11.27 tons in any 12 consecutive month period
	5. Pursuant to the best available control technology provision of 310 CMR 7.02(8)(a)2, the rust preventive shall not exceed 0.07 pounds of HAPs per gallon, as applied.	Total HAP	≤0.14 tons in any 12 consecutive month period
	6. Pursuant to the best available control technology provision of 310 CMR 7.02(8)(a)2, no more than 3954.39 gallons of rust preventive shall be used ¹ in any 12 consecutive month period.		

Table 2b			
EU#	Operational / Production Limit	Air Contaminant	Emission Limit
54	7. Pursuant to the best available control technology provision of 310 CMR 7.02(8)(a)2, the rust preventive shall not exceed 5.7 pounds of VOCs per gallon, as applied.	VOC	≤1.1 tons in any 12 consecutive month period
	8. Pursuant to the best available control technology provision of 310 CMR 7.02(8)(a)2, the rust preventive shall not exceed 0.07 pounds of HAPs per gallon, as applied.	Total HAP	≤0.014 tons in any 12 consecutive month period
	9. Pursuant to the best available control technology provision of 310 CMR 7.02(8)(a)2, no more than 385.96 gallons of rust preventive shall be used ¹ in any 12 consecutive month period.		

Table 2a/2b Key:

EU# = Emission Unit Number
VOC = Volatile Organic Compounds
HAP =Hazardous Air Pollutants

Table 2a/2b Notes

1. The amount of rust preventive used means the amount of that particular material that is evaporated to atmosphere. Any material recovered from the applicable EU in liquid form need not be counted toward the usage limitation provided 1) the amount and identity of the recovered material is recorded and 2) it is 100% rust preventive.

B. COMPLIANCE DEMONSTRATION

The Permittee is subject to, and shall comply with, the monitoring, testing, record keeping, and reporting requirements as contained in Tables 3, 4, and 5 below:

Table 3	
EU#	Monitoring and Testing Requirements
52 53 54	1. The Permittee shall monitor all operations to ensure sufficient information is available to comply with 310 CMR 7.12 Source Registration
	2. If and when MassDEP requires it, the Permittee shall conduct emission testing in accordance with USEPA Reference Test Methods and regulation 310 CMR 7.13

Table 3 Key:

EU# = Emission Unit Number

Table 4	
EU#	Recordkeeping Requirements
52 53 54	1. The Permittee shall maintain adequate records on-site to demonstrate compliance with all operational, production, and emission limits contained in Tables 2a and 2b above. Records shall also include the actual emissions of air contaminant(s) emitted for each calendar month and for each consecutive twelve month period (current month plus prior eleven months). These records shall be compiled no later than the 15 th day following each month. An electronic version of the MassDEP approved record keeping form, in Microsoft Excel format, can be downloaded at http://www.mass.gov/dep/air/approvals/aqforms.htm#report .
	2. The Permittee shall maintain records of monitoring and testing as required by Table 3.
	3. The Permittee shall maintain a copy of this Plan Approval, underlying Application for the EU(s) approved herein on-site.
	4. The Permittee shall maintain a record of routine maintenance activities performed on the approved EU(s). The records shall include, at a minimum, the type or a description of the maintenance performed and the date and time the work was completed.
	5. The Permittee shall maintain a record of all malfunctions affecting air contaminant emission rates on the approved EU(s). At a minimum, the records shall include: date and time the malfunction occurred; description of the malfunction; corrective actions taken; the date and time corrective actions were initiated and completed; and the date and time emission rates and monitoring equipment returned to compliant operation.
	6. The Permittee shall maintain records to ensure sufficient information is available to comply with 310 CMR 7.12 Source Registration.
	7. The Permittee shall maintain records required by this Plan Approval on-site for a minimum of five (5) years.
	8. The Permittee shall make records required by this Plan Approval available to MassDEP and USEPA personnel upon request.

Table 4 Key:

EU# = Emission Unit Number

PCD = Pollution Control Device

SOMP = Standard Operating and Maintenance Procedure

USEPA = United States Environmental Protection Agency

Table 5	
EU#	Reporting Requirements
52 53 54	<ol style="list-style-type: none"> 1. The Permittee shall submit to MassDEP all information required by this Plan Approval over the signature of a “Responsible Official” as defined in 310 CMR 7.00 and shall include the Certification statement as provided in 310 CMR 7.01(2)(c). 2. The Permittee shall notify the Western Regional Office of MassDEP, BAW Compliance & Enforcement Chief by telephone: 413-755-2131, email: saadi.motamedi@state.ma.us, or fax : 413-784-1149, as soon as possible, but no later than three (3) business day after discovery of an exceedance(s) of Tables 2a and 2b requirements.. A written report shall be submitted to Permit Chief at MassDEP within ten (10) business days thereafter and shall include: identification of exceedance(s), duration of exceedance(s), reason for the exceedance(s), corrective actions taken, and action plan to prevent future exceedance(s). 3. The Permittee shall provide a copy to MassDEP of any record required to be maintained by this Plan Approval within 30-days from MassDEP’s request.

Table 5 Key:

EU# = Emission Unit Number

4. **SPECIAL TERMS AND CONDITIONS**

The Permittee is subject to, and shall comply with, the following special terms and conditions:

A. The Permittee shall comply with the Special Terms and Conditions as contained in Table 6a/6b below:

Table 6a	
EU#	Special Terms and Conditions
52 53	1. Pursuant to the best available control technology provision of 310 CMR 7.02(8)(a)2, the rust preventive material shall only be applied to the stock within an application chamber which is fully enclosed except for where the stock enters and exits the chamber.
	2. Pursuant to the best available control technology provision of 310 CMR 7.02(8)(a)2, dragout of rust preventive from the application chamber shall be minimized by the use of felt pads, or other similar material or method.
	3. Pursuant to the best available control technology provision of 310 CMR 7.02(8)(a)2, the rust preventive application chamber shall be equipped with a reservoir which is fully enclosed.
54	4. Pursuant to the best available control technology provision of 310 CMR 7.02(8)(a)2, the rust preventive shall only be applied to coils and band saw blades by hand using a felt pad, or other similar material, and a plunger can.
	5. Pursuant to the best available control technology provision of 310 CMR 7.02(8)(a)2, plunger cans shall be fully enclosed except for when the plunger is depressed to apply rust preventive.
	6. Pursuant to the best available control technology provision of 310 CMR 7.02(8)(a)2, the rust preventive shall only be applied to port-a-band blades by placing them, by hand, into a dip pan of rust preventive material and then removing them to a drainage rack.
	7. Pursuant to the best available control technology provision of 310 CMR 7.02(8)(a)2, the rust preventive collected from the drainage rack shall drain into the dip pan.
	8. Pursuant to the best available control technology provision of 310 CMR 7.02(8)(a)2, the carry out of rust preventive from the dip pan shall be minimized by allowing the port-a-band blades to drain on the drainage rack into the dip pan for 30 seconds or until the rust preventive is no longer dripping from the blade, whichever is longer.
	9. Pursuant to the best available control technology provision of 310 CMR 7.02(8)(a)2, the dip pan containing rust preventive shall be completely covered when not in use.
	10. Pursuant to the best available control technology provision of 310 CMR 7.02(8)(a)2, when the rust preventive is draining from the drainage rack into the dip pan and the dip pan is not being used to coat port-a-bands, the dip pan shall be closed except for a minimal opening that is only large enough to allow the rust preventive to drain from the drainage rack into the dip pan.

Table 6b	
EU#	Special Terms and Conditions
52	11. EU #52, #53 and #54 shall consist of the equipment specified in Table 1 herein.
53	
54	12. Pursuant to the best available control technology provision of 310 CMR 7.02(8)(a)2, the rust preventive material used in EU #52, #53 and #54, shall consist of Houghton International Inc. Rust Preventive 2142-95-01, or equivalent as determined by MassDEP. 13. Pursuant to the best available control technology provision of 310 CMR 7.02(8)(a)2, the Permittee shall comply with the following work practices: <ul style="list-style-type: none"> a. Store all VOC and/or HAP-containing materials and process-related waste materials in closed containers; b. ensure that mixing and storage containers used for VOC and/or HAP-containing materials and, process-related waste materials are kept closed at all times except when depositing or removing these materials; c. minimize spills of VOC and/or HAP-containing materials and process-related waste materials; d. convey VOC and/or HAP-containing materials and process-related waste materials from one location to another in closed containers or pipes; e. store and dispose of all absorbent materials, such as cloth or paper, that are contaminated with VOC and/or HAP-containing materials and process-related waste materials in non-absorbent containers that shall be kept closed except when placing materials in or removing materials from the container. 14. The Permittee shall determine compliance with the rust preventive VOC and HAP content requirements according to the following: <ul style="list-style-type: none"> a. manufacturer's labeling and product technical data information; or b. testing in accordance with ASTM E1868-10 or any other method approved by MassDEP

Table 6a/6b Key:

EU# = Emission Unit Number

VOC = Volatile Organic Compounds

HAP = Hazardous Air Pollutants

5. GENERAL CONDITIONS

The Permittee is subject to, and shall comply with, the following general conditions:

- A. Pursuant to 310 CMR 7.01, 7.02, 7.09 and 7.10, should any nuisance condition(s), including but not limited to smoke, dust, odor or noise, occur as the result of the operation of the Facility, then the Permittee shall immediately take appropriate steps including shutdown, if necessary, to abate said nuisance condition(s).
- B. If asbestos remediation/removal will occur as a result of the approved construction, reconstruction, or alteration of this Facility, the Permittee shall ensure that all removal/remediation of asbestos shall be done in accordance with 310 CMR 7.15 in its entirety and 310 CMR 4.00.
- C. If construction or demolition of an industrial, commercial or institutional building will occur as a result of the approved construction, reconstruction, or alteration of this Facility, the Permittee shall ensure that said construction or demolition shall be done in accordance with 310 CMR 7.09(2) and 310 CMR 4.00.
- D. Pursuant to 310 CMR 7.01(2)(b) and 7.02(7)(b), the Permittee shall allow MassDEP and / or USEPA personnel access to the Facility, buildings, and all pertinent records for the purpose of making inspections and surveys, collecting samples, obtaining data, and reviewing records.
- E. This Plan Approval does not negate the responsibility of the Permittee to comply with any other applicable Federal, State, or local regulations now or in the future.
- F. Should there be any differences between the Application and this Plan Approval, the Plan Approval shall govern.
- G. Pursuant to 310 CMR 7.02(3)(k), MassDEP may revoke this Plan Approval if the construction work is not commenced within two years from the date of issuance of this Plan Approval, or if the construction work is suspended for one year or more.
- H. This Plan Approval may be suspended, modified, or revoked by MassDEP if MassDEP determines that any condition or part of this Plan Approval is being violated.
- I. This Plan Approval may be modified or amended when in the opinion of MassDEP such is necessary or appropriate to clarify the Plan Approval conditions or after consideration of a written request by the Permittee to amend the Plan Approval conditions.
- J. The Permittee shall conduct emission testing, if requested by MassDEP, in accordance with USEPA Reference Test Methods and regulation 310 CMR 7.13. If required, a pretest

protocol report shall be submitted to MassDEP at least 30 days prior to emission testing and the final test results report shall be submitted within 45 days after emission testing.

- K. Pursuant to 310 CMR 7.01(3) and 7.02(3)(f), the Permittee shall comply with all conditions contained in this Plan Approval. Should there be any differences between provisions contained in the General Conditions and provisions contained elsewhere in the Plan Approval, the latter shall govern.

6. MASSACHUSETTS ENVIRONMENTAL POLICY ACT

MassDEP has determined that the filing of an Environmental Notification Form (ENF) with the Secretary of Energy & Environmental Affairs, for air quality control purposes, was not required prior to this action by MassDEP. Notwithstanding this determination, the Massachusetts Environmental Policy Act (MEPA) and 301 CMR 11.00, Section 11.04, provide certain "Fail-Safe Provisions," which allow the Secretary to require the filing of an ENF and/or an Environmental Impact Report (EIR) at a later time.

7. APPEAL PROCESS

This Plan Approval is an action of MassDEP. If you are aggrieved by this action, you may request an adjudicatory hearing. A request for a hearing must be made in writing and postmarked within twenty-one (21) days of the date of issuance of this Plan Approval.

Under 310 CMR 1.01(6)(b), the request must state clearly and concisely the facts, which are the grounds for the request, and the relief sought. Additionally, the request must state why the Plan Approval is not consistent with applicable laws and regulations.

The hearing request along with a valid check payable to the Commonwealth of Massachusetts in the amount of one hundred dollars (\$100.00) must be mailed to:

Commonwealth of Massachusetts
Department of Environmental Protection
P.O. Box 4062
Boston, MA 02211

This request will be dismissed if the filing fee is not paid, unless the appellant is exempt or granted a waiver as described below. The filing fee is not required if the appellant is a city or town (or municipal agency), county, or district of the Commonwealth of Massachusetts, or a municipal housing authority.

MassDEP may waive the adjudicatory hearing-filing fee for a person who shows that paying the fee will create an undue financial hardship. A person seeking a waiver must file, together with

the hearing request as provided above, an affidavit setting forth the facts believed to support the claim of undue financial hardship.

Should you have any questions concerning this Plan Approval, please contact Cortney Danneker by telephone at 413-755-2234, or in writing at the letterhead address.

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Marc Simpson
Air Quality Permit Chief
Bureau of Air and Waste

cc: WERO AQ plan file
WERO AQ approval file

ecc: MassDEP/WERO – Peter Czapienski
MassDEP/Boston - Yi Tian